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September 22, 2006

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

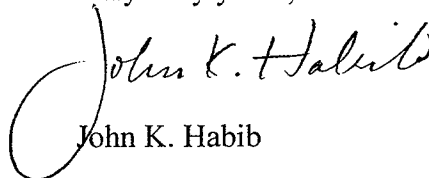
Re: Boston Edison Company, D.T.E. 06-15

Dear Ms. Cottrell:

Please find attached on behalf of Boston Edison Company, d/b/a NSTAR Electric (the "Company") responses to information requests asked by the Department of Telecommunications and Energy, as listed on the following page. The Company seeks an extension until October 6, 2006, to file its response to information request DTE-3-1 in order to provide the Company with additional time to compile the substantial amount of information sought by the Department in that request.

Thank you for your attention to this matter. Please contact me if you have any questions about the filing.

Very truly yours,



John K. Habib

Enclosures

cc: John Keene, Hearing Officer
Joseph Rogers, Assistant Attorney General
Ron LeComte, Director, Electric Power Division
Kevin Brannelly, Director, Rates and Revenue Requirements Division

INFORMATION REQUEST RESPONSES ATTACHED

DTE-3-2

DTE-3-3

DTE-3-4

DTE-3-5

Information Request DTE-3-2

In the current Annual Service Quality Plan Performance Report, Section 2.II.A.1, the Company states: "... The deadband for this measure for each NSTAR Electric and NSTAR Gas company will be calculated by determining the standard deviation associated with the Company's 5-year historical performance for this measure and applying it to the benchmark of 80 percent of calls answered within 30 seconds." Please identify if the "5 year historical performance" was reflected in the DTE 05-85 Settlement, and provide appropriate cite(s). If not, explain the company's rationale for selecting this period.

Response

Paragraph 2.29 of the Settlement Agreement approved by the Department in D.T.E. 05-85 establishes for NSTAR Electric a performance benchmark for call answering of 80 percent of calls answered within 30 seconds including abandoned calls. The Settlement Agreement does not change the manner by which penalties and offset credits are to be computed under the Department's Guidelines. Accordingly, the Annual Service Quality Plan continues to measure offsets and penalties consistent with the Department's D.T.E. 99-84 Guidelines, *i.e.*, by taking the Company's historical performance for the measure and calculating a standard deviation from this historical performance to create a deadband for penalty/offset calculation. The only difference is that the Company is applying the standard deviation based on historical performance to a static benchmark of 80 percent of calls answered within 30 seconds including abandoned calls, rather than a moving benchmark from year-to-year.

The five-year historical performance period was chosen because, prior to 2001, Boston Edison Company does not have historical data measuring call answering performance within a 30-second timeframe. Prior to that year, the Company measured call answering performance only within a 20 second timeframe. Moreover, the Department has recognized that, when computing a standard deviation for purposes of penalty/offset calculation, at least three years of historical data is necessary to provide a statistically significant sample sufficient to determine a reliable deadband. D.T.E. 99-84 Guidelines at Section I.C. Accordingly, the available five-year historical performance period for calculating a standard deviation for this measure is appropriate to determine a penalty/offset deadband for NSTAR Electric's call answering measure.

Information Request DTE-3-3

On Schedule 1, page 1 of 2, the Company identified that 2005 performance observation for “% Calls Answered” was 76.36. Footnote 2 on that page states this statistic is based on “calls handled within 20 seconds, includes abandoned calls.” On Schedule 1, page 2 of 2, the Company provides the 1995 through 2004 yearly statistics for this measure. Footnote 2 on this page again identifies that these statistics are based on “calls handled within 20 seconds, includes abandoned calls.” Please confirm the accuracy of each footnote. In addition, identify for each year (1995 through 2005) what these individual yearly statistics for this measure would be if based on calls handled within 30 seconds, including abandoned calls.

Response

The footnotes are accurate. Boston Edison has measured its call answering performance as “calls answered within 20 seconds, including abandoned calls” since 1995. The incorporation of abandoned calls into the statistic was accomplished by dividing: (1) the total calls answered within 20 seconds (not including abandoned calls); by (2) total calls offered, including abandoned calls. This formula is different that used by Cambridge Electric Light Company and Commonwealth Electric Company, because these companies calculated calls answered in 30 seconds by dividing (1) the total calls answered within 30 seconds (not including abandoned calls); by (2) total calls offered, less abandoned calls at 30 seconds.

Prior to 2001, Boston Edison did not track call answering performance within 30 seconds and thus, cannot provide the Department with this information. For purposes of calculating a standard deviation to be applied to the new NSTAR Electric Telephone Service Factor benchmark of “80 percent of calls answered within 30 seconds, including abandoned calls,” per the D.T.E. 05-85 Settlement, the Company calculated 5 years of historical data by dividing: (1) the total calls answered within 30 seconds, plus abandoned calls within 30 seconds; by (2) the total calls offered, including abandoned calls. Accordingly, this formula incorporates a numerator and denominator that are more consistent with each other and is consistent with the Settlement measure, which requires the incorporation of abandoned calls into the calculation. This five year history, from 2001 through 2005 is provided in Appendix 12 in each of NSTAR Electric’s ASQR filings.

Information Request DTE-3-4

Please provide an updated Appendix 12 with 10 years (1995 through 2004) of Percent Calls Answered, where the statistics reflect calls handled within 30 seconds, including abandoned calls.

Response

Please see the Company's response to Information Request DTE-3-4.

Information Request DTE-3-5

In prior annual filings these numbers the numbers for the Telephone Answering Factor for 2005 listed on Form B, Appendix 12 and in Section 2. II.A.1 were the same value. However, in the Company's Annual Service Quality Plan performance report dated March 1, 2006, these numbers are different (please note that in Appendix 12 the data for years 2004 and 2005 are also the same). Please explain this discrepancy.

Response

Appendix 12 reflects the Company's Telephone Answering Factor benchmark for 2006, which, for 2006 and going forward, is 80 percent of calls answered within 30 seconds, including abandoned calls, per the Company's D.T.E. 05-85 Settlement. Accordingly, the historical data in Appendix 12 reflects NSTAR Electric's 2001 through 2005 call answering performance for calls answered within 30 seconds including abandoned calls within 30 seconds (see the Company's responses to Information Request DTE-3-2 and DTE-3-3). In contrast, the Company's 2005 benchmark, reflected in Form B and Section 2. II.A.1, is based on the Company's historical Telephone Answering Factor performance as calculated pursuant to its approved Service Quality Plan, per D.T.E. 99-84, which is calculated based on the Company's call answering performance within 20 seconds. Moreover, the Company's historical Telephone Answering Factor data incorporated abandoned calls differently than the Company is proposing for 2006 and beyond (see response to Information Request DTE-3-3).

Please also note that the historical performance for NSTAR Electric for this measure in 2004 and 2005, as found in Appendix 12, is accurate. The numbers appear identical because they have been rounded to two decimal points.